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TOMORROW ENERGY CORP.
fka SPERIAN ENERGY CORP.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDREW PERRONG and JAMES EVERETT
SHELTON, individually and on behalf of all others
similarly situated,

Plaintiff,

vs.

TOMORROW ENERGY CORP fka SPERIAN
ENERGY CORP, a Nevada corporation, and
ENERGY GROUP CONSULTANTS, INC., a
Kansas corporation, BAETYL GROUP LLC, a
Texas limited liability company,

Defendants.

Related Cross-Claims and Third-Party Claims.

Case No. 2:19-cv-00115-RFB-EJY

**DECLARATION OF HARRISON
BROWN IN CONNECTION WITH
TOMORROW ENERGY CORP FKA
SPERIAN ENERGY CORP'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR SANCTIONS
DIRECTED TO DEFENDANT ENERGY
GROUP CONSULTANTS, INC.**

1 I, Harrison Brown, declare as follows:

2 1. I am admitted *pro hac vice* to practice in this action. I am an associate at Blank Rome
3 LLP, counsel for Tomorrow Energy Corp. fka Sperian Energy Corp. (“Tomorrow Energy” or
4 “Sperian”). I make this declaration in connection with Sperian’s Opposition to the Emergency
5 Motion for Sanctions filed by Plaintiffs Andrew Perrong (“Mr. Perrong”) and James Everett Shelton
6 (“Mr. Shelton”) (together, “Plaintiffs”) (Dkt. No. 113, the “Sanctions Motion”). I make this
7 declaration of my personal knowledge and my review of the litigation file kept in the ordinary course
8 of business, and could and would testify competently hereto.

9 2. On December 3, 2019, Adrienne McEntee, counsel for Plaintiffs, emailed me copies
10 of documents, each entitled “Notice of Intent to Serve Subpoena.” One notice advises that Plaintiffs
11 intend to subpoena documents from Tyde Bonaparte, and the other notice advises that Plaintiffs
12 intend to subpoena documents from John Williams. Each notice includes a copy of the proposed
13 subpoenas. Attached hereto as **Exhibit 1** is a true and correct copy of the Notice of Intent to Serve
14 Subpoena on Mr. Bonaparte, which I received by email on December 3, 2019. Attached hereto as
15 **Exhibit 2** is a true and correct copy of the Notice of Intent to Serve Subpoena on Mr. Williams,
16 which I received by email on December 3, 2019.

17 3. As of the date of this declaration, Plaintiffs have not issued subpoenas to perform on-
18 site inspections of the workstations of Mr. Bonaparte and Mr. Williams.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed on this 6th day of January, 2020, in Los Angeles, California.

21
22
23 By: /s/ Harrison Brown
24 Harrison Brown